

April 11, 2025

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street NE
Washington, DC 20554

Re: Delete, Delete, Delete, FCC GN Docket No. 25-133

Dear Chairman Carr,

The below signed companies congratulate you on your elevation to the role of Chairman of the Federal Communications Commission. We commend you for your many years serving the country as an FCC Commissioner, General Counsel, Legal Advisor, and Attorney Advisor and look forward to your continued leadership at the FCC.

As you know, the FCC plays a pivotal role in fostering innovation and ensuring American leadership in the commercial space sector. Your tenure as Chairman presents an opportunity to build on and improve the FCC's history of serving the best interests of the industry. As the public notice in this proceeding recognizes, there is ample room to modernize the FCC's rules and processes in light of the speed of innovation, and we applaud your decision to prioritize changes that promote a vibrant ecosystem for continued advancements by U.S. commercial space companies. Each of the signatories to this letter encourage you to take the following steps to promote continued investment and innovation in the commercial space sector:

1. Currently, in-space servicing, assembly, and manufacturing operators must rely only on special temporary authority to access spectrum. By their nature, those authorizations only provide access to required radio frequencies for short periods of time and without the ability to rely on accessing the spectrum in the future. These limitations have hindered our ability to develop novel technologies that have the promise to improve many aspects of American life. The FCC has an open proceeding on this issue, and we encourage you to expeditiously adopt rules that provide dedicated spectrum for this critical subset of space operators that currently lack an FCC spectrum allocation.
2. The FCC's rules and application filing procedures were developed at a time when the primary licensees were communication satellites, but today, the ecosystem is rapidly evolving with new technologies entering the market at a rapid pace. The FCC should simplify its satellite and earth station licensing processes to avoid duplicative federal coordination efforts, which will increase the FCC's ability to more quickly process license applications.

3. Spectrum is a finite resource and must be shared between commercial and federal users. We encourage you to work with the National Telecommunications and Information Administration to increase commercial access to spectrum bands that federal users can safely share without creating harmful interference to the critical missions of those federal users.

Taking these bold steps will foster substantial innovation and investment in the U.S. commercial space sector. Congratulations once again on assuming the role of Chairman of the FCC and thank you for your continued focus on promoting U.S. leadership in space. We stand ready to assist you in that endeavor.

Sincerely,

/s/

Peter Dohm
CEO, Stellar Frequencies

/s/

William Bruey
CEO, Varda Space Industries

/s/

Ian Cinnamon
CEO, Apex Space

/s/

Giovanni Pandolfi
CEO, Leaf Space

/s/

Matt Gialich
CEO, AstroForge

/s/

Johannes Gross
CEO, Planetary Utilities

/s/

Max Holliday
CEO, EarthTraq

/s/

Bridgit Mendler
CEO, Northwood Space